



**SPECIAL CONTROL UNIT AGAINST
MONEY LAUNDERING (SCUML)**

DISCLAIMER/REGISTRATION GUIDELINE

SERVICE LEVEL AGREEMENT (SLA)

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DISCLAIMER

It has come to the notice of the Special Control Unit against Money Laundering that certain individuals and entities are advertising to facilitate SCUML registration and certification on websites and social media platforms, including Instagram, Meta (Facebook), WhatsApp, and Twitter.

DNFBPs and the general public are hereby warned that such individuals and entities are not agents, affiliates, or representatives of SCUML or so authorized by any means, arrangements, or understanding to act on behalf of SCUML.

We hereby reaffirm that SCUML registration and certification are completely free of Charge. These processes can only be completed through the official website of SCUML, www.scuml.efcc.gov.ng It is crucial for individuals and entities to be aware that any attempts to engage with third parties for assistance in facilitating SCUML registration and certification are done at their own risks and SCUML will not be liable under any circumstances.

Furthermore, where these third-party individuals and entities provide emails, phone numbers, and other information that are not valid or non-operational during registration process, the DNFBP and its Directors will be held personally accountable. SCUML will not assume responsibility for any unsuccessful attempts to establish communication with these emails, phone numbers or physical addresses

NOTE:

DNFBPs/NPOs should ensure that all required documents are merged and compressed into a single PDF file, not exceeding 2.5MB (2500KB). We recommend using a PDF compressor for this purpose.

For further inquiries, please contact SCUML at:

No. 5 Fomella Street,
Off Ademola Adetokunbo Crescent,
Wuse II, Abuja, FCT.

Email: helpdeskscuml@efcc.gov.ng

Tel: 07079190693



DOCUMENTS REQUIRED FOR SCUML REGISTRATION

Please read carefully the registration guidelines before proceeding with registration

1. DEALERS IN LUXURY GOODS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
 - b. Status Report (Form BN-01)
 - c. Tax Identification Number (TIN) Printt out
-

2. DEALERS IN JEWELERY

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

3. CAR DEALERS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

4. SUPERMARKET

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

5. HOTELS AND HOSPITALITY BUSINESS(ES)

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

6. CASINOS, POOL BETTING & LOTTERY BUSINESSES

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- License from State Lotteries Board

7. AUDIT FIRMS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Professional certificate with ICAN or ANAN or ACCA

8. TAX CONSULTANTS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Professional certificate with ICAN or ANAN or ACCA or CITN

9. ACCOUNTING FIRMS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Professional certificate with ICAN or ANAN or ACCA

10. ESTATE SURVEYORS AND VALUERS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Nigerian Institution of Estate Surveyors and Valuers (NIESVs) or

11. DEALERS IN REAL ESTATE

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

12. MECHANIZED FARMING

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

13. CONSTRUCTION COMPANIES

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

14. MORTGAGE BROKERS

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

15. CONSULTING COMPANIES

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Relevant Consulting certificate (**OPTIONAL**)

16. CLEARING & FORWARDING COMPANIES

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- I. Evidence of registration with the COUNCIL FOR THE REGULATION OF FREIGHT FORWARDING IN NIGERIA (CRFFN)

17. DEALERS IN PRECIOUS METAL & STONES (D PMS)

LIMITED LIABILITIES

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- a. Mining licence/lease
- b. Mineral buying license

18. LAW FIRMS

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out

BUSINESS NAME

- a. Certificate of Registration of Business Name
- b. Status Report (Form BN-01)
- c. Tax Identification Number (TIN) Print out

ADDITIONAL REGISTRATION REQUIREMENT

- Call to Bar Certificate or Legal Practicing certificates

19. NON-PROFIT ORGANIZATIONS (NPOS) (AT RISK NPOS)

NPOs are made up of;

- a. Humanitarian / Charitable Organizations
 - I. International
 - II. Local
- b. Religious/Faith Based Organizations
- c. Associations/Clubs

NPOs

- a. Certificate of Incorporation
- b. Incorporation of Trustees
- c. Constitution
- d. Tax Identification Number (TIN) or Tax Exemption Print Out
- e. Copy of cooperation Agreement (For international NGOs)

NPOs that are limited by Guarantee (LTG / GTE)

- a. Certificate of Incorporation
- b. Memorandum and Articles of Association
- c. Status Report or its Equivalent (CAC 1.1 or CAC 7 and CAC 2)
- d. Tax Identification Number (TIN) Print out



SCUML
Special Control Unit
against Money Laundering

ECONOMIC AND FINANCIAL CRIMES COMMISSION

AML/CFT COMPLIANCE CHECKLIST **FOR** DNFbps



AML/CFT COMPLIANCE CHECKLIST FOR DNFBPS

S/N	Required Action	Compliance Checks / Key Questions	Penalty for Non-Compliance
1	Prohibition on acceptance and receipt of cash payments above thresholds (Section 2 ML(PP)A 2022)	- Are all client payments above N5,000,000 (individual) or N10,000,000 (corporate) made through financial institutions?- Does the company maintain records of payment methods for each transaction?	Fine: N4,000,000 (professionals) or N2,000,000 (businesses). In aggravated cases, criminal prosecution under ML(PP)A 2022.
2	Identification of clients/customers with valid official identification documents	- Are clients identified and verified before any transaction?- Are copies of IDs retained and verified?- Is there a checklist for KYC compliance?	Fine: N2,000,000 (professionals) or N1,000,000 (businesses). Criminal prosecution in aggravated cases.
3	Declaration of business activities to SCUML	- Has the company registered with SCUML and obtained a certificate?- Is the SCUML certificate displayed ?- Are new business lines declared to SCUML?	Fine: N200,000 (professionals) or N100,000 (businesses). Criminal prosecution in aggravated cases.
4	Reporting of occasional cash transactions exceeding \$1,000 or equivalent	- Are cash transactions exceeding \$1,000 recorded and reported to SCUML/?- Is there a transaction monitoring system to flag such cash deals?- Are employees aware of reporting obligations?	Fine: N50,000 per unreported transaction (for both professionals and businesses). Criminal prosecution in aggravated cases.
5	Establishment of internal policies, procedures, and controls to detect and report suspicious transactions	- Does the company have a written AML/CFT/CPF policy?- Is there a designated compliance officer?- Are staff trained periodically on AML obligations?- Are currency transactions escalated for review?	Fine: N2,000,000 (professionals) or N1,000,000 (businesses). Criminal prosecution in aggravated cases.
6	Filing of Suspicious Transaction Reports (STRs)	- Are STRs filed promptly with NFIU when suspicious activity is detected? - Are STR decisions documented and approved by compliance officer or management?- Is there a record of all filed STRs?	Fine: N2,000,000 (professionals) or N1,000,000 (businesses). Criminal prosecution in aggravated cases.



AML/CFT COMPLIANCE CHECKLIST FOR DNFBPS

S/N	Required Action	Compliance Checks / Key Questions	Penalty for Non-Compliance
7	Report threshold transactions as required by law	<ul style="list-style-type: none"> Has the company reported any transaction, lodgement, or transfer of funds done using financial instrument above N5,000,000 (individual) or N10,000,000 (corporate body)? Were the reports submitted within 7 days of the transaction? 	Fine of N100,000 for each unreported transaction. In aggravated circumstances, criminal prosecution applies.
8	Conduct Targeted Financial Sanctions (TFS) Screening	<ul style="list-style-type: none"> Are all customers and transactions screened against the UN Consolidated Sanctions List and Nigeria Sanctions List? Is there a documented process for sanctions screening and escalation of positive matches? 	Fine of N1,000,000 per violation (professionals) or N500,000 (businesses). In aggravated cases, criminal prosecution applies.
9	Register with the Nigeria Sanctions Committee Alert System	<ul style="list-style-type: none"> Has the company registered with the Nigeria Sanctions Committee Alert System? Do you monitor the system actively for updates (new listings and de-listings) alerts? 	Fine of N500,000 (professionals) or N300,000 (businesses) for failure to register. In aggravated cases, fine of N1,000,000 or criminal prosecution applies.
10	Obtain and maintain valid SCUML registration and professional licenses	<ul style="list-style-type: none"> Is the company duly registered with SCUML? Are all business and professional licenses valid and up to date? (Is this not same as 5 above) 	Fine of N2,000,000 (for both professionals or businesses) depending on severity. In aggravated cases, criminal prosecution applies.

11	Maintain adequate records of transactions	<ul style="list-style-type: none"> Are transaction records preserved for a minimum period of 5 years after completion of transactions? Are the records preserved in a manner that it can be easily reconstructed of each transaction? 	Fine of N300,000 (Professionals) or N200,000 (Businesses) and a warning letter for minor breaches. N500,000 fine if violation recurs after a warning, with escalation to SCUML and relevant SRO for additional punishments.
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AML/CFT COMPLIANCE CHECKLIST FOR DNFBPS

12	Communicate AML/CFT/CPF policies and procedures to all employees	- Has every employee been trained on the company's AML/CFT/CPF policies and procedures? • Are employees aware of their roles and reporting obligations?	Fine of N200,000 (Professionals) or N100,000 (Businesses). Fine of N500,000 if the violation persists for a period of six (6) months.
13	Appoint a Compliance Officer at management level	- Has a Compliance Officer been appointed at management level? • Does the officer have clearly defined AML/CFT/CPF duties and responsibilities?	Fine of N150,000 (both professionals or businesses) where no appointment evidence exists. For non-appointment beyond six (6) months, N500,000 monthly until compliance.
14	Implement AML/CFT/CPF training for all categories of employees	- Implement AML/CFT/CPF training for all categories of employees. Has every staff been trained on AML/CFT across all departments?	Fine of N300,000 (professionals) or N150,000 (businesses) for failure to train employees. Where the violation continues for more than two (2) years. N1,000,000 penalty shall apply.

15	Classification of customers into Risk Categories and apply Customer Due Diligence	<ul style="list-style-type: none"> • Are customers classified into Risk Categories? (High, Medium and low risk) • Do you carry out Customer Due Diligence carried according to the risk profiles of the customer? 	A warning letter for minor breaches (for professionals and businesses). A penalty of N500,000 if violation recurs after a one (1) year, with observation of a SCUML officer.
16	Put-in place ML, TF and PF risk classification system in accordance with National Risk Assessment and Risk Based Guidance	<ul style="list-style-type: none"> • Have you read the report of the National Risk Assessment on ML/TF/PF? Have you identified the risks in the report and domesticated it? Have you developed controls to the risks as it affects your business? Have you classified the ML, TF and PF risks in your organization? • Is classification system in accordance with National Risk Assessment and Risk Based Guidance? 	Fine of N250,000 (for professionals and businesses). A fine of N500,000 if the violation persists for more than one (1) year with a SCUML examiner observation.
17	Obtain information on	<ul style="list-style-type: none"> • Have you collected beneficial ownership information from the 	Fine of N500,000 (professionals) or

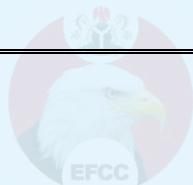




AML/CFT COMPLIANCE CHECKLIST FOR DNFBPS

	<p>beneficial owners in transactions where the customer is an intermediary or representative of another party in all circumstances or form such representation may take</p>	<p>official CAC portal www.bor.cac.gov.ng</p> <ul style="list-style-type: none"> • 	<p>N250,000 (businesses). A penalty of N1,000,000 if violation recurs after one (1) year a SCUML examiner observed the violation.</p>
18	<p>Remedial Action- preparation and maintenance of records of observed deficiencies in the AML, CFT and policies procedures of DNFBPs and records of remedial actions taken by the Internal Audit</p>	<ul style="list-style-type: none"> • Ensure you keep records of all corrective/remedial actions taken to address the observed ML/TF/PF deficiencies. 	<p>Fine of N100,000 and a warning letter (professionals) or N50,000 and a warning letter (businesses).</p>

19	<p>Ensure Management or Compliance Officer does not override approved AML/CFT/CPF controls</p>	<ul style="list-style-type: none"> • Are AML/CFT/CPF controls strictly followed without interference? • Are there safeguards preventing management or compliance officers from overriding controls? 	<p>Fine of N500,000 (professionals) or N250,000 (businesses) depending on severity. Suspension of professional license for two years where override occurred. Stricter sanctions if override facilitates ML/TF activities.</p>
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AML/CFT COMPLIANCE CHECKLIST FOR DNFBPS

20	Establish monitoring mechanisms for Politically Exposed Persons (PEPs)	<ul style="list-style-type: none"> • Does the company have systems to identify and monitor PEPs? • Are PEP transactions subject to enhanced due diligence? 	Fine of N500,000 (professionals) or N300,000 (businesses). N1,000,000 penalty if violation continues beyond two (2) years. SCUML may escalate to SRO for additional sanctions.
21	Ensure Internal Audit has capacity to review AML/CFT compliance functions	<ul style="list-style-type: none"> • Does the internal audit department conduct AML/CFT reviews? • Is there evidence of capacity (training, staffing, and tools)? Is the auditor trained on AML/CFT compliance? 	Fine of N250,000 (professionals) or N150,000 (businesses). Where violation persists for more than two (2) years, monthly penalty of N500,000 applies.
22	Conduct periodic AML/CFT/CPF compliance reviews and update findings	<ul style="list-style-type: none"> • Does the internal audit or compliance unit conduct periodic reviews? • Are compliance gaps documented and corrective actions implemented? 	Fine of N150,000 (professionals) or N100,000 (businesses). For non-compliance after six (6) months, an additional fine of N500,000 applies until compliance is achieved.
23	Review and Update AML/CFT/CPF Policies and Procedures after every three (3) years	<ul style="list-style-type: none"> • Does your company review and update AML/CFT/CPF policies after every three (3) years? 	Fine of N200,000 (professionals) or N100,000 (businesses) with evidence of revised policies. In aggravated circumstances a fine of N500,000 with evidence of revised policies.





ECONOMIC AND FINANCIAL CRIMES COMMISSION